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10	UNITED STATES	DISTRICT COURT
11	NORTHERN DISTRICT OF CALIFO	DRNIA, SAN FRANCISCO DIVISION
12	WAYMO LLC,	CASE NO. 3:17-cv-00939-WHA
13	Plaintiff,	DECLARATION OF FELIPE
14	VS.	CORREDOR IN SUPPORT OF PLAINTIFF WAYMO LLC'S CORRECTED ADMINISTRATIVE
15	UBER TECHNOLOGIES, INC.; OTTOMOTTO LLC; OTTO TRUCKING	CORRECTED ADMINISTRATIVE MOTION TO FILE PORTIONS OF ITS
16	LLC,	OFFER OF PROOF REGARDING DEFENDANTS' TRADE SECRET MISAPPROPRIATION
17	Defendants.	MISAFFROFRIATION
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I, Felipe Corredor, declare as follows:

- I am an attorney licensed to practice in the State of California and am admitted to 1. practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.
- 2. I make this declaration in support of Waymo's Administrative Motion to File Under Seal Portions of Its Offer of Proof Regarding Defendants' Trade Secret Misappropriation ("Waymo's Offer of Proof"), filed concurrently herewith (the "Administrative Motion"). The Administrative Motion seeks an order sealing the following materials filed concurrently herewith:

Document	Portions to Be Filed	Designating Party
	Under Seal	
Waymo's Offer of Proof	Highlighted portions	Waymo (green
		highlighting),
		Defendants (blue
		highlighting), third
		party Velodyne (yellow
		highlighting), and third
		parties related to the
		ownership of Tyto
		LiDAR (red
		highlighting)

- 3. Specifically, the green highlighted portions of Waymo's Offer of Proof contain or refer to trade secret information, which Waymo seeks to seal.
- 4. The green highlighted portions of Waymo's Offer of Proof contain, reference, and/or describe Waymo's trade secrets. The information Waymo seeks to seal includes the confidential design and functionality of Waymo's proprietary autonomous vehicle system, including its LiDAR designs, which Waymo maintains as secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo's business (Dkt. 25-31). The public disclosure of this information would give Waymo's competitors access to descriptions of the functionality or features of Waymo's autonomous vehicle system. If such information were made public, I understand that Waymo's competitive standing would be significantly harmed.

1	5. Waymo's request to seal is narrowly tailored to those portions of Waymo's Offer of
2	Proof that merit sealing.
3	6. Waymo only seeks to seal the portions of Waymo's Offer of Proof (highlighted blue,
4	yellow, and red) identified in the table above, because Waymo believes such information is considered
5	confidential or non-public by Defendants, third party Velodyne, or third parties related to the
6	ownership of Tyto LiDAR.
7	
8	I declare under penalty of perjury under the laws of the State of California and the United
9	States of America that the foregoing is true and correct, and that this declaration was executed in San
10	Francisco, California, on August 25, 2017.
11	By /s/ Felipe Corredor
12	Felipe Corredor Attorneys for WAYMO LLC
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16	SIGNATURE ATTESTATION
17	Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
18	filing of this document has been obtained from Felipe Corredor.
19	/s/ Charles K. Verhoeven
20	Charles K. Verhoeven
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CORREDOR DECLARATION ISO WAYMO'S ADMINISTRATIVE MOTION TO SEAL

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